

1 MILES EHRLICH (Bar No. 237954)
miles@ramsey-ehrllich.com
2 ISMAIL RAMSEY (Bar No. 189820)
izzy@ramsey-ehrllich.com
3 AMY CRAIG (Bar No. 269339)
amy@ramsey-ehrllich.com
4 RAMSEY & EHRLICH LLP
803 Hearst Avenue
5 Berkeley, CA 94710
(510) 548-3600 (Tel)
6 (510) 291-3060 (Fax)

7 Attorneys for Non-Party Anthony Levandowski
8

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 WAYMO LLC,

13 Plaintiff,

14 v.

15 UBER TECHNOLOGIES, INC., *et al.*,

16 Defendants.
17
18
19

Case No.: 3:17-cv-00939 WHA

**DECLARATION OF ISMAIL RAMSEY
IN SUPPORT OF NON-PARTY
ANTHONY LEVANDOWSKI'S LETTER
BRIEF IN RESPONSE TO WAYMO'S
OPPOSITION TO MOTION TO QUASH
PORTIONS OF SUBPOENA TO STROZ
FRIEDBERG, LLC**

1 I, Ismail Ramsey, declare as follows:

2 1. I am a member of the bar of the State of California and a partner of the firm
3 Ramsey & Ehrlich LLP, counsel for Non-Party Anthony Levandowski. I make this declaration
4 of personal, first-hand knowledge, and if called and sworn as a witness, I could and would testify
5 competently as follows.

6 2. Attached hereto as **Exhibit 1** is a true and correct copy of email correspondence
7 between counsel for Anthony Levandowski, counsel for Waymo, counsel for Defendants,
8 counsel for Stroz Friedberg, and Special Master John Cooper, dated May 31, 2017.

9 3. In a resulting meet and confer call with Special Master John Cooper, parties
10 confirmed that the return date for the non-expedited requests for Waymo's subpoena to Stroz
11 was June 9, and accordingly the parties agreed that the deadline for Mr. Levandowski to file a
12 motion to quash or for protective order was June 9.

13 4. I make this declaration in support of Non-Party Anthony Levandowski's Letter
14 Brief in Response to Waymo's Opposition to Mr. Levandowski's Motion to Quash Portions of
15 Waymo's Subpoena to Stroz Friedberg, LLC.

16
17 I declare under penalty of perjury under the laws of the State of California and the United
18 States of America that the foregoing is true and correct, and that this declaration was executed in
19 Berkeley, California, on June 19, 2017.

20
21 Date: June 19, 2017

Respectfully submitted,

22
23 /s/ Ismail Ramsey
24 Ismail Ramsey
25 Ramsey & Ehrlich LLP
26
27 *Counsel for Non-Party*
28 *Anthony Levandowski*